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11 UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

12 "Lily," *et al.*,

Case No. 2:19-cv-00352-RFB-EJY

13 Plaintiffs,

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15 **STIPULATION AND AGREED ORDER
FOR EXTENSION OF DEFENDANT'S
DEADLINES TO RESPOND
(Second Request)**

v.

16 Jan Rouven Fuechtener,

Defendant.

17 **Stipulation for Extension of Time**

18 This stipulation is entered into by the following parties: Plaintiffs, by and
through their attorneys of record Carol Hepburn, Deborah Bianco, and John Kawai,
and Defendant Jan Fuechtener by and through his attorneys Lance J. Hendron and
Zachary Lee Newland (collectively "the Parties"). The Parties hereby stipulate and
agree that Fuechtener's deadlines to respond to Plaintiffs' Motion for Summary
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Judgment (ECF No. 41) and Plaintiffs' Request for Judicial Notice (ECF No. 42) are extended to August 31, 2020. This is the second stipulation for an extension of time for Fuechtener to respond to these motions. The stipulated extension is requested due to the fact that Fuechtener's counsel, Zachary Newland, was out of the office for family leave did not return to work until July 1, 2020. In the past two weeks, Fuechtener's counsel was required to evacuate his home due to wildfires; counsel also had to travel to Texas to attend the funeral of a family member who passed away due to COVID-19. Additionally, Fuechtener's counsel's recent work and deadlines in other matters includes, among other items:

- On July 22, 2020, Counsel filed a motion to reduce sentence and brief in support in the Northern District of Texas in United States v. Crawford, No. 5:17-cr-00026-C;
- On August 21, 2020, Counsel has a deadline to file the opening brief in the Seventh Circuit in United States v. Anthony Alexander, case number 20-02001;
- On July 16, 2020, Counsel filed a motion to reduce sentence and brief in support in the Northern District of Texas in United States v. Ward, No. 4:17-cr-00157-A;
- On August 19, 2020, Counsel has an evidentiary hearing on a motion under 28 U.S.C. § 2255 before the U.S. District Court for the District of Maine in United States v. Corbett, case number 2:15-cr-00031;

- 1 • On July 21, 2020, Counsel filed a motion to reduce sentence and brief in
- 2 support in the Southern District of Florida in United States v. Robinson, No.
- 3 1:18-cr-20554;
- 4 • On August 25, 2020, Counsel has a sentencing hearing in the U.S. District
- 5 Court for the Eastern District of Kentucky in United States v. Turner, 6:18-
- 6 cr-00032;
- 7 • On September 2, 2020, Counsel has a sentencing hearing in the U.S. District
- 8 Court for the Northern District of Texas in United States v. Rice, No. 3:18-cr-
- 9 587;
- 10 • On August 3, 2020, Counsel has multiple deadlines to file replies in support
- 11 of motions to reduce sentence in the U.S. District Court for the District of
- 12 Kanas.

13 As a result of counsel's leave and other obligations, additional time is needed
14 to allow Fuechtener to adequately consult with counsel prior to responding to
15 Plaintiffs' motions.

16 The Parties stipulate and agree that the time for Fuechtener to respond to
17 Plaintiffs' Motion for Summary Judgment is extended to August 31, 2020. The
18 Parties stipulate and agree that the time for Fuechtener to respond to Plaintiffs'
19 Request for Judicial Notice is extended to August 31, 2020. The Parties ask that the
20 Court approve of this stipulation and enter an order granting Fuechtener an
21 extension of time.

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21 Attorneys for Plaintiffs

1 **AGREED ORDER GRANTING EXTENSION OF TIME**

2 THIS MATTER, having come before the Court upon the Parties' stipulation,
3 and the Court having reviewed this stipulation and the files and records herein, and
4 being fully advised, based on the voluntary agreement of the parties:

5 It is ORDERED that Counsel for Defendant Jan Fuechtener shall be granted
6 an extension of time until August 31, 2020 to file any response to Plaintiffs' Motion
7 for Summary Judgment.

8 It is further ORDERED that Counsel for Defendant Jan Fuechtener shall be
9 granted an extension of time until August 31, 2020 to file any response to Plaintiffs'
10 Request for Judicial Notice.

12 IT IS SO ORDERED this 4th day of August 2020.

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14 RICHARD F. BOULWARE, II
15 UNITED STATES DISTRICT JUDGE
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